



Crawley 2035

Ref No: <i>Office use only</i>

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client's name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple "PART B" sections with a single "PART A" completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent's details
Title:	<input type="text"/>	<input type="text"/>
First name:	<input type="text"/>	<input type="text"/>
Surname:	<input type="text"/>	<input type="text"/>
Organisation:	<input type="text" value="Gatwick's Big Enough"/>	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	<input type="text"/>	<input type="text"/>
Postcode:	<input type="text"/>	<input type="text"/>
Telephone:	<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>	<input type="text"/>

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="Strategic Policy GAT 1"/>	Other:	<input type="text"/>
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5. Do you consider the Local Plan to be: (Please tick)

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

On 12th December 2018, Crawley Borough's Full Council voted, by a significant majority, to oppose Gatwick's masterplan and on 17th July the Council declared a climate emergency. Against this background, we are both surprised and disappointed that the Council's policy in relation to Gatwick Airport appears so out of step with its previously stated position.

As currently drafted, not only does the Council's proposed policy fail to accord with these previously stated positions, but in a number of areas falls short of what we believe is required to establish an appropriate long term strategy in relation to Gatwick Airport:

- The policy does not define, or set out in any other clear way, what is meant by the "sustainable growth" of Gatwick Airport. In our view, there is no such thing as sustainable growth at Gatwick. Given current and foreseeable technology, any growth in flight numbers at

Gatwick is very likely to result in increases in CO2 emissions as well as additional noise, congestion and air quality impacts. The proposals set out in Gatwick's masterplan have been estimated to result in an additional 1m tons of CO2 emissions annually. Most of this would come from more intensive use of GAL's main runway, within a single runway two terminal configuration. Consequently, we cannot understand how the Council could overwhelmingly reject that growth in its response to the masterplan, but now appears to be willing to facilitate it through its planning policies.

- The policy does not acknowledge or take account of the scale of growth that Gatwick is pursuing within a single runway two terminal structure. The Council currently supports growth in this configuration to a throughput of 45 mppa and will be aware that Gatwick now wishes to increase this to a throughput of 61 mppa, an increase of over 35%. Such an increase would have profound impacts on local people and those under flight paths, on local infrastructure and for the environment more broadly, particularly climate change. Those impacts are not addressed in the draft plan and the proposed policy is unlikely to be capable of dealing with them adequately.

- A requirement to "minimise" and "appropriately mitigate" the impacts of the airport's operations is neither balanced nor consistent with government policy. It gives priority to the airport's growth aspirations at the expense of the interests of people impacted by its operations and the environment more generally. Current Government policy (as set out in the Aviation Policy Framework) requires that "future growth in aviation should ensure that benefits are shared between the aviation industry and local communities. This means that the industry must continue to reduce and mitigate noise as airport capacity grows". The Aviation 2050 Green Paper reinforced these goals when it said that its aim was to "balance noise and growth". The Council's proposed policy fails to reference any concept of balance between the competing interests or of noise reduction and is therefore unlikely to achieve government policy objectives.

If required, please continue your response on an additional piece of paper and securely attach it to this response

7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

In our view, the Council's plan should instead set out a cap above which it would not support growth in the airport's passenger and ATM numbers unless it could be clearly demonstrated, through a robust planning process and consultation, that the proposed growth met all relevant local and national policies, including the Paris Agreement, and appropriately balanced community, environmental and industry interests.

Gatwick is the only major UK airport that does not have a planning cap. As we discussed at our recent meeting, the absence of such a cap severely constrains the Council's ability to control the impacts of the airport's operations on local people, those under flight paths and the environment, and to achieve a fair balance between competing interests. We would therefore suggest that the Council takes this opportunity to make clear to Gatwick that it wishes to negotiate an appropriate cap, to bring Gatwick into line with other airports, and that it will implement a robust planning policy unless and until one is agreed.

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. **If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?** *(Please tick)*

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. **If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:**

The environmental and community impacts of Gatwick airport are profound and impact communities many miles from the airport. It is, in our view, important that these impacts, and the deficiencies in the current draft local plan in relation to them, are discussed widely including in public examination hearings.

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature

██████████ completed on

Date

02/03/2020